

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NORTH DAKOTA**

In Re: Vanity Shop of Grand Forks, Inc., Debtor.	Case No.: 17-30112 Chapter 11
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**MOTION TO APPROVE SETTLEMENT WITH STATUTORY INSIDERS AND
RELATED PARTIES**

The Debtor, Vanity Shop of Grand Forks, Inc. (“Debtor”), pursuant to Fed. R. Bank. P. 9014, 9019, and 2002, moves this Court to approve the settlement reached at a mediation conducted on June 19, 2018. The complete terms of the settlement were read into the record and are summarized below.

I. PARTIES INVOLVED IN MEDIATION

1. Debtor
2. The Official Committee of the Unsecured Creditors, represented by Julie Minnick Bowden (Chairperson)
3. The following entities and individuals (collectively the “Statutory Insiders and Related Parties”):
 - a. Vanity, Inc.
 - b. Apparel Real Estate LLP
 - c. Barrier Lakes Investments, LLC
 - d. Boothill Corporation
 - e. Bottrell Family Investments, LP
 - f. Diamond B Companies, Inc.
 - g. Diamond B Technology Solutions, LLC
 - h. Parsec Data Management, Inc.
 - i. Sales Floor Live, LLC
 - j. Shazzam!, Inc.
 - k. TGC, LP
 - l. Treco Constructors, Inc.



- m. Bottrell, Thompson, Hull, Hauff, Donarski, Knoll, Andrews, Gust & Andrews, P.C.
- n. Estate of Don Bottrell
- o. Teresa Bottrell
- p. Marnie Bennett (formerly known as Marnie Kimbrough)
- q. James Bennett
- r. Colette Anderson-Bottrell
- s. Lowell Bottrell
- t. Stephen J. Anderson
- u. Stephen J. Anderson IRA

II. ISSUES RESOLVED AT MEDIATION

1. Vanity, Inc. will pay the sum of \$170,000 to the Debtor.
2. The general unsecured claim of TGC, LP (Claim No. 281 - \$5,248,777.43) will be reduced to \$2,850,000 and allowed as a general unsecured, non-priority claim in the amount of \$2,850,000 and otherwise disallowed.
3. The Statutory Insiders and Related Parties and their respective officers, directors, employees, shareholders, and members, whether past or present, are released and forever discharged from any and all claims, controversies, causes of action, obligations, losses, damages and liabilities of every kind and character whatsoever, regardless of whether the basis of the liability is premised upon tort or contract, and any and all other unasserted causes of action whether known or unknown, and whether the causes of action are presently asserted or unasserted arising from or related to any transactions with the Debtor or its estate or acts or omissions relating to the Debtor or its estate, including any claims the Debtor, the Plan Administrator, the trustee in any Chapter 7 case, or the Committee could assert against the Statutory Insiders and Related Parties for preference, conversion, fraudulent conveyance and/or transfer, and any and all other causes of action commonly asserted against insiders and related corporate entities in Bankruptcy Court proceedings.
4. The Debtor's Plan will be amended as further agreed upon as part of the mediated settlement.

Dated this 18th day of July, 2018.

VOGEL LAW FIRM

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COUNSEL TO DEBTOR IN POSSESSION

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